

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. 05-CV-10488-JLA

TIMOTHY HILLS
Plaintiff

v.

TOWN OF STOUGHTON
Defendant

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JOINT MOTION TO CONTINUE PRE-TRIAL

Now come the parties and respectfully request that the Court continue the Pre-Trial scheduled for Wednesday, October 5, 2005.

In support of said Motion, the parties suggest that the Plaintiff has recently filed a Motion to Amend the Complaint to add two individual defendants and at this time counsel for the individual defendants has not filed his or her Appearance or Answer.

At this time it would be premature to have a pre-trial conference without the attorney representing the individual defendants present and it would be impossible to determine who would prepare the voluntary disclosures.

Respectfully submitted,
Plaintiff, Timothy Hills
By his Attorneys,

COLUCCI, COLUCCI, MARCUS & FLAVIN, P.C.

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Respectfully submitted,
Defendant, Town of Stoughton
By its Attorneys,

WYNN & WYNN, P.C.

/s/ Charles D. Mulcahy

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Dated: September 22, 2005